IN THE

Supreme Court of the United States

October Term 1955

No. 654

EDITH NEUMAN DE VEGVAR, *Petitioner*

v.

WHITNEY GILLILLAND, PEARL CARTER PACE, and HENRY J. CLAY, constituting the Foreign Claims Settlement Commission of the United States, and GEORGE M. HUMPHREY, as Secretary of the Treasury of the United States of America, *Respondents*

On Petition For A Writ of Certiorari to the United States Court of Appeals for the District of Columbia Circuit

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BRIEF FOR AMICI CURIAE IN OPPOSITION

INTEREST OF AMICI CURIAE

Pursuant to Rule 42 of the Revised Rules of this Court, Victor K. Anninger, Steven Ausnit, Corn Products Refining Company, Walter Petschek, Socony Mobil Oil Company, Inc., Karel Charles Stiassni, and Francis Price, Jr. and Dennis G. Karzag, executors of estate of William Zimdin, by their respective attorneys, respectfully submit this brief *amici curiae* in opposition to the petition for certiorari. Written consent has been given by counsel for the petitioner and by the Solicitor General, counsel for respondents.

The *amici curiae* are holders of awards, and in some cases are also the authorized representatives of related awardholders, exceeding $7,000,000 in aggregate principal amount, which awards were made by the respondent For-

eign Claims Settlement Commission and certified to respondent Secretary of the Treasury, pursuant to the Yugoslav Claims Agreement (62 Stat. 2658) and the International Claims Settlement Act (64 Stat. 12, 67 Stat. 506, 22 U.S.C. §1621 *et seq.*).

In the five-year adjudication of Yugoslav claims under the Act, the Commission received 1554 claims totaling $149,344,249.70, denied 678 claims, and certified to the Treasury 876 awards totaling $18,817,904.89 plus interest from the date of expropriation to August 21, 1948. Under the terms of the Act, the Secretary of the Treasury is "authorized and directed" to distribute the Yugoslav Claims Fund in the Treasury to the awardholders, and "only" to the awardholders (or their successors in interest), certified by the Commission, after deducting 5% for administrative expense. §§ 7(a), 7(b), 7(c), 8(c). Any balance remaining after such distribution is to be returned to Yugoslavia. § 8(d).

The available Fund consists of the $17,000,000 paid by Yugoslavia in full settlement of the claims specified under the Agreement. § 8(d). The Fund is therefore insufficient to pay any interest awarded by the Commission, or to pay the full principal of the 646 awards exceeding $1,000, including those held by the *amici curiae*. See *Hearings on Foreign Claims Settlement Commission*, H. Comm. on Foreign Affairs, 84th Cong. 1st Sess. (1955) p. 98. Pursuant to the Act, the Treasury has paid the full principal (less 5%) of awards of $1000 or less, and was in process of distributing the remainder of the Fund *pro rata* among the other awardholders when the court below entered its restraining order on July 20, 1955 (R. 13a).[1] The present balance in the Fund is $7,485,299.92.

[1] Record pages in this brief refer to the printed joint appendix in the Court of Appeals, which is included in the record certified by the Clerk of that court pursuant to Rule 21(3).

See stipulation dated July 21, 1955 in companion case, *Charles Neuman de Vegvar* v. *Gillilland et al,* Civil Action #1189-55, D.C. D.C.

Petitioner does not question the validity of the awards so certified, but nevertheless seeks to enjoin their payment pending reconsideration of her own claim (R. 9a), which the Commission had denied after hearing (Pet. 7-8; R. 4a-6a). The Act expressly provides that "the action of the Commission in allowing or denying any claim under this Act shall be final and conclusive on all questions of law and fact and not subject to review . . . by any court by mandamus or otherwise". § 4(h).

The pendency of this single action [2] has tied up most of the present balance in the Fund and is delaying full *pro rata* distribution thereof to the holders of 646 awards including the *amici curiae.* See respondents' Opposition to motion to continue stay, dated January 4, 1956, in the certified record. The Act does not provide for payment of current interest on unpaid balances of awards. The restraining order entered by the court below did not require petitioner to post bond, and petitioner has given no security pending consideration of the petition for certiorari, to protect the awardholders against the substantial, irreparable and continuing losses caused by such delay in payments. The interruption of orderly and full *pro rata* distribution has resulted in other manifest inequities as to the proportions of awards distributed to date to various awardholders. See respondents' Opposition, *supra.*

The Agreement and Act were designed to implement American foreign policy to secure prompt, adequate and effective compensation for eligible nationals of the United

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[2] The restraining order entered by the Court of Appeals impounded $5,885,848.04, the full amount of petitioner's rejected claim (Pet. 4, 24 n.5).

States; i.e., the awardholders, whose property was expropriated by Yugoslavia approximately ten years ago. Even the prompt and full distribution of the Fund would have afforded only partial compensation for such long-standing deprivations of property rights by Yugoslavia. Petitioner's insubstantial suit is further increasing the losses suffered by delaying payments directed by law.

This action has thus caused the very inequity and confusion that Congress intended to prevent by writing into the Act its express bar against litigation of Commission decisions by disappointed claimants. As summarized in the opinion below: "Congress knew that if each claimant could take his claim to the courts the Fund could not safely be distributed until every last litigation had been terminated. Considerations of both domestic and foreign policy called for the prompt distribution of the Fund and the ending of disputes between Yugoslavia and the United States" (Pet. 22-23).

ARGUMENT

I

THE DECISION BELOW CORRECTLY APPLIED THE PLAIN LANGUAGE OF THE STATUTE EXPRESSLY PRECLUDING REVIEW OF THE COMMISSION'S ACTION DENYING PETITIONER'S CLAIM.

Petitioner concedes that this suit arises "under" the International Claims Settlement Act (R. 2a) and that the Commission's decision denying her claim "is not . . . appealable or reviewable under the statute" (R. 9a). The two courts below correctly held that the District Court had no jurisdiction over the subject matter of petitioner's suit, since the statute provides unequivocally that "the action of the Commission in . . . denying any claim under this Act shall be final and conclusive on all questions of law and fact and not subject to re-

view . . . by any court by mandamus or otherwise". § 4(h).

Under Article 1 of the Yugoslav Claims Agreement of 1948 (R. 30a), Yugoslavia paid the United States the sum of $17,000,000 "in full settlement and discharge" of various claims against Yugoslavia by the United States, and of all claims against Yugoslavia by nationals of the United States "on account of the nationalization and other taking by Yugoslavia" of property between September 1, 1939 and the date of the Agreement. Article 8 of the Agreement provided that the fund—

> "shall be distributed to the Government of the United States and among the several claimants, respectively, in accordance with such methods of distribution as may be adopted by the Government of the United States. Any determinations with respect to the *validity or amounts* of individual claims which may be made by the agency established or otherwise designated by the Government of the United States to adjudicate such claims shall be final and binding" (R. 35a) [italics added].

The International Claims Settlement Act, approved March 10, 1950, established the Commission[3] and vested it with "jurisdiction to receive, examine, adjudicate, and render final decisions with respect to claims of the Government of the United States and of nationals of the United States included within the terms of the Yugoslav Claims Agreement of 1948 . . .". § 4(a). Each decision was to be by majority vote and "constitute a full and final disposition" of the case. § 4(b). The Commission's action "in allowing or denying any claim" after hearing

[3] The International Claims Commission originally established under the Act was reconstituted as the Foreign Claims Settlement Commission, by Reorganization Plan Number 1 of 1954. H. Doc. 381, 83d Cong. 2d Sess., effective July 1, 1954. 68 Stat. 1279.

is not reviewable by the Secretary of State or any other official or by any court. § 4(h), quoted *supra*. The statutory finality is underscored by other provisions whereby the Secretary of the Treasury is "authorized and directed" to distribute the Fund "only" to the person or persons on behalf of whom awards were made and certified by the Commission, or to designated successors in interest. §§ 7(c), 8(c).

In the legislative debates, Congress confirmed the Congressional purpose simply to afford all claimants an opportunity to present their claims against Yugoslavia for final determination by the Commission. In an extended discussion on the House floor, Congressman Ribicoff, who had reported the bill from the House Committee on Foreign Affairs, stressed that the finality clause in Section 4(b) and the preclusion of judicial review in Section 4(h) "mean precisely what they say" (95 Cong. Rec. 8840), and had been designed to prevent litigation delays "where one claimant with one appeal could tie up the settlement of 1,500 claims". *Id.*, p. 8854. He also stressed that the expropriations covered by the settlement "are not actions arising out of the laws of the United States, and therefore do not come within the purview of the constitutional requirements regarding the authority of the courts". *Id.*, p. 8840. For similar reasons the Committee had concluded that the claims were outside the statutory jurisdiction and proper scope of the Court of Claims. *Id.*, pp. 8840, 8845-8846. In foreclosing review, the Committee had specifically relied upon the unanimous decision of this Court in *Z & F Assets Corp.* v. *Hull*, 311 U.S. 470 (discussed *infra*). *Id.*, pp. 8845, 8853.[4]

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[4] A minority report by Congressman Vorys acknowledged that "A claimant cannot even challenge this act, for 'any person who makes application for any such payment shall be held to have consented to all the provisions of this Act' (Sec. 6e)." H. Rep. 770 pt. 2, 81st Cong. 1st Sess. p. 2. This provision was retained in the bill as enacted. § 7(e). Congressman Ribicoff explained

Following such thorough discussion, the House rejected an amendment to strike out Section 4(h) and substitute the review provisions of the Administrative Procedure Act. *Id.*, pp. 8853-8855.

Article 3 of the Agreement expressly excludes "claims of individual nationals of the United States who did not possess such nationality at the time of the nationalization or other taking" (R. 31a-32a). Excluded claimants such as petitioner were required to settle their claims directly with Yugoslavia. *Id.* Congress was fully cognizant of this express limitation on eligibility of Yugoslav claims. 95 Cong. Rec. 8838; 96 *id.* 2966.

On the very issue of "other taking" urged by the petitioner (Pet. 15), Congress recognized that the Agreement embraced situations where "actual transfer of title in a normal sense may not have occurred, yet holders of property may have been effectively deprived of ownership rights". The "specific application of 'other taking'" in individual cases was left to final decision by the Commission, "in justice to all claimants".[5]

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that all the prospective claimants who appeared before the Committee had favored the finality provisions because "we are setting up here an expeditious handling of claims. We know that if you take these claims and get them involved in continuous court controversy, it will be many, many years before these claims are settled". 95 Cong. Rec. 8854.

[5] "It is known that some property owners were effectively deprived of property rights by Yugoslav authorities without formal nationalization. 'Nationalization' under Yugoslav law called for compensation to be paid in accordance with Yugoslav law. Property and property rights have also been confiscated without compensation by Yugoslav authorities, placed under informal or formal sequestration, held under administration, or put in the possession or control of others. Actual transfer of title in a normal sense may not have occurred, yet holders of property may have been effectively deprived of ownership rights. Since the Yugoslav agreement covers the period of September 1, 1939, to July 19, 1948, the intent was undoubtedly to encompass all actual deprivation of property.

Petitioner admittedly was not a national of the United States on January 19, 1946, the date when her property was actually "taken" by Yugoslavia as found by the Commission (R. 6a). Petitioner is really complaining of an allegedly erroneous finding by the Commission as to the meaning of "other taking". Respondents' motion to dismiss did not admit petitioner's argumentative allegations that the Commission's finding was "arbitrary" or "capricious", or petitioner's conclusions of law that the Commission here violated the Agreement or the Act in any respect (R. 7a-8a). See *Nortz* v. *United States*, 294 U.S. 317, 324-325; *Equitable Life Ins. Co.* v. *Brown*, 213 U. S. 25, 43. In any event, the Commission's decision (R. 38a) was made in the exercise of its full power and authority under the Act, and is clearly not reviewable. The Commission's ruling excluding certain evidence, to which petitioner objects (R. 4a; Pet. 8), also concerned the issue of 'other taking'. The power to decide the case necessarily included the customary authority to pass on the relevancy, materiality or competency of proffered evidence.[6]

As the Court of Appeals held: "Errors in the result reached, or errors in the admission of evidence or in the making of a legal ruling—assuming such errors to have been made—are not grounds for judicial intervention in

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"Variations of 'other taking' are many—too many and too complicated to enumerate. The problem is essentially judicial. The most difficult and important legal issues before the Commission will doubtless arise as to the phrase 'other taking.' *It is believed that consistent with the intent of the Yugoslav agreement, the specific application of 'other taking' should be left to the Commission.* Prejudgment, either administrative or legislative, should be avoided in justice to all claimants." S. Rep. 800, Committee on Foreign Relations, 81st Cong. 1st Sess., p. 10 [italics added].

[6] See Administrative Procedure Act, § 7(c), 60 Stat. 237, 5 U.S.C. § 1006(c); *Attorney General's Manual on the Administrative Procedure Act* (1947) p. 76.

the face of the congressional fiat that the Commission's determinations shall be free of judicial review" (Pet. 23).

Petitioner was accorded a hearing under the Act (R. 4a; Pet. 7-8), and concedes that the Commission "had jurisdiction to receive, examine, adjudicate and render a final decision with respect to" her claim (Pet. 7). Petitioner is really proceeding on the anomalous theory that the Commission had "jurisdiction" only to decide in her favor. Petitioner's position is not essentially different from that of numerous claimants whose claims were denied by the Commission in the exercise of its power and authority to determine the validity as well as the amount of claims. Probably half the 1554 claims filed were denied in whole or part because the claimant or the claim[7] was ineligible to share in the Fund. The Commission denied 195 claims, totaling $40,271,718, on the general ground here involved; namely, that the claimant was not a national of the United States on the date of actual "taking" by Yugoslavia. See *Hearings on Foreign Claims Settlement Commission,* H. Comm. on Foreign Affairs, 84th Cong. 1st Sess. (1955) p. 111. In so doing, the Commission was applying to varying sets of facts the provisions of Article 3 of the Agreement, which were also consistent with long-established principles of inter-

[7] "The Yugoslav claims agreement of 1948 is a settlement of a defined category of claims. In consideration of the payment of $17,000,000 the Yugoslav Government was discharged of obligation with respect to such claims. Claims not settled were not discharged and remain unsettled obligations of Yugoslavia. For example, the Yugoslav Government is not released as to nationalization or other taking after July 19, 1948. Thus also, the claims settled do not include creditor interests." S. Rep. 800, 81st Cong. 1st Sess., p. 11. Also excluded from sharing in the settlement fund were claims for certain trade-mark rights (Art. 6; R.34a), war damages (Art. 7; R.35a), exchange restrictions (Art. 10; R.36a-37a), blocked bank accounts (Art. 11; R.37a), and dollar bonds issued by predecessor Yugoslav Governments (62 Stat. 2658, 2664).

national law (R. 38a-42a). See 5 *Hackworth, Digest of International Law* (1943) pp. 802-804 (Department of State Publication #1927); 1 *Oppenheim's International Law* (7th ed. by Lauterpacht, 1948) pp. 314-315.[8]

Since Congress foreclosed review here, the petitioner cannot invoke the "equitable processes" (R. 9a) of the District Court, *Z & F Assets Corp.* v. *Hull*, 311 U.S. 470, 489, or the Declaratory Judgment Act. *Skelly Oil Co.* v. *Phillips*, 339 U.S. 667, 671-672.[9]

II

THE DECISION BELOW IS CLEARLY CONSISTENT WITH THE APPLICABLE DECISIONS OF THIS COURT

1. This Court has repeatedly sustained the finality of certifications as to the validity or amount of international claims settled by a domestic commission or officer, pursuant to Executive treaty or agreement and Congressional enactment. See *Comegys* v. *Vasse*, 26 U.S. (1 Pet.) 193, 212; *United States* v. *Ferreira*, 54 U.S. (13 How.) 40, 47; *Meade* v. *United States*, 76 U.S. (9 Wall.) 691, 719, 725; *Williams* v. *Heard*, 140 U.S. 529, 539; *cf.* 5 *Moore, History and Digest of International Arbitrations*, appendix on domestic commissions, pp. 4505, 4512, 4542-4544, 4650-

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[8] Although the merits of the Commission's decision or of petitioner's contentions are not reviewable, it is noteworthy that petitioner's argument on 'other taking' is contrary to the clear pronouncement of the Senate Committee on Foreign Relations in reporting this legislation. *Supra*, pp. 7-8 n.5.

[9] Petitioner does not invoke the Administrative Procedure Act as a separate basis of jurisdiction in the District Court. In any event, that Act is unavailing where, as here, "(1) statutes preclude review or (2) agency action is by law committed to agency discretion". § 10, 60 Stat. 237, 5 U.S.C. § 1009. The House rejected an amendment to extend the review provisions of the Administrative Procedure Act to the International Claims Settlement Act here involved. Supra, p. 7.

4651 (G.P.O. 1898). Finality was implied from the nature and background of the legislation in these instances. More recently, in *Z & F Assets Corp.* v. *Hull,* 311 U.S. 470, 489, under the Settlement of War Claims Act of 1928 (45 Stat. 254), which likewise contained no express bar to judicial review, this Court held that "for the purpose of payment under the statute the certificate of the Secretary of State must be deemed to be conclusive". The Court there affirmed, as a matter of law, dismissal of a suit by certain awardholders to enjoin the Secretary of State from certifying and the Secretary of the Treasury from paying certain awards by a mixed claims commission, which were allegedly invalid under the applicable statute (*supra*) and Executive agreement (42 Stat. 2200, 2203).[10] The instant case is even stronger, since petitioner does not challenge the validity of the many awards certified by the Commission for payment; petitioner herself is only a disappointed claimant without standing under the express provisions of the very statute relied upon; and the instant statute expressly bars judicial review of Commission decisions either allowing or denying claims.

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[10] "Congress had complete power to decide what payments should be made from that [special deposit] account and to attach such conditions as it saw fit. . . ." (311 U.S. at 486). "The question in this relation is simply one of the intent of Congress as disclosed by the Act. Congress has expressly directed payments to be made from the special account of the awards 'so certified.' The literal and natural import of this provision is that finality is to be accorded to the certificate of the Secretary of State and we perceive no ground for limiting the terms of the Act by construction. . . . . Petitioners must claim solely by virtue of their interest in the fund created by the statute and under its terms they are not entitled to complain of payments out of that fund of awards which the Secretary of State has certified" (p. 489).

This Court has carefully distinguished suits concerning the validity and amount of claims from suits to determine derivative rights in awards duly made and certified, or to compel the Secretary of the Treasury to pay awards pursuant to his ministerial duty. See *Mellon* v. *Orinoco Iron Co.*, 266 U.S. 121; *Williams* v. *Heard, supra; Comegys* v. *Vasse, supra;* and cases distinguished in *Z & F Assets Corp.* v. *Hull,* 114 F.2d 464, 472-473 (D.C. Cir.).

The espousal of claims on the diplomatic level, and the certification of awards to eligible primary claimants, are traditional acts of grace by the United States, functioning through the Executive. 1 *Whiteman, Damages in International Law* (1937) p. 275 (Department of State Publication #960); 3 *id.*, pp. 2046-2048. The Yugoslav Claims Agreement was itself part of a broad settlement of intergovernmental problems on the inter-governmental level. H. Rep. 770, 81st Cong. 1st Sess. pp. 2-4. By establishing the Fund in the Treasury (§ 8(a)), Congress assumed no liability toward any claimant (§ 7(f)), and was under no "legal or equitable obligation" to pay any claim. See *Williams* v. *Heard*, 140 U. S. at 537-538; *Z & F Assets Corp.* v. *Hull*, 114 F.2d 464, 472, aff'd 311 U.S. 470. In specifying the conditions for payment from this national fund, including finality of Commission decisions granting or denying claims, Congress expressly relied upon the *Z. & F. Assets* decision (*supra*, p. 6), which confirmed the traditional finality in settling international claims, whether by domestic or mixed commissions. *Supra*, pp. 10-11.

2. If Congress had not expressly precluded review, "the type of problem involved and the history of the statute in question become highly relevant in determining whether judicial review may be nonetheless supplied." See *Switchmen's Union* v. *National Mediation Board*, 320 U.S. 297, 301. In comparable situations, where the designated agency was empowered to determine the eligibility of claimants and claims, this Court has effectuated statutes implicitly precluding judicial review, notwithstanding allegations that the agency had misinterpreted applicable law. *Butte A. & P. Ry. Co.* v. *United States*, 290 U.S. 127, 136-143; *Work* v. *Rives*, 267 U.S. 175, 181-182; *United States* v. *Babcock*, 250 U.S. 328, 331; *cf. United States* v. *Binghamton Constr. Co.*, 347 U.S. 171, 176-177; *Perkins* v. *Lukens Steel Co.*, 310 U.S. 113; *Hadden* v. *Merritt*, 115 U.S. 25.

Petitioner's alleged injury manifestly does not "reach the dignity of a legal right in the strict sense", since the nature and provisions of the International Claims Settlement Act show that Congress never intended to create "a statutory privilege protected by judicial remedies". See *Stark* v. *Wickard,* 321 U.S. 288, 306. The Act does not stop with the word "final", or bar review only as to "amount" of awards. Section 4(h) precludes review in explicit and comprehensive language, language which had previously been construed by this Court "to remove the possibility of judicial relief", *Lynch* v. *United States,* 292 U.S. 571, 587, even in the special circumstances suggested in the *Williams* case (278 U.S. 255), cited by petitioner (Pet. 13). See also *Hahn* v. *Gray,* 203 F.2d 625, 626 (D.C. Cir.). In establishing the conditions for payment from a national fund in the Treasury, Congress expressly negatived petitioner's argument (Pet.15-16) that the denial of her claim grounded a right of action in the courts.

The Court of Appeals correctly concluded that no issue of personal liberty or other constitutionally protected right was presented or involved (Pet.23). See *Switchmen's Union* v. *National Mediation Board,* 320 U.S. at 301; *Lockerty* v. *Phillips,* 319 U.S. 182, 187; *Z & F Assets Corp.* v. *Hull,* 311 U.S. at 486; *District of Columbia* v. *Eslin,* 183 U.S. 62, 65-66. The explicit statutory provisions foreclosing review here are sanctioned by Article III Section 1 of the Constitution; the Court of Appeals deemed it unnecessary to decide whether the courts should deny review on other grounds (Pet. 24). See 311 U.S. at 489.

III

NO OTHER SUBSTANTIAL BASIS IS PRESENTED FOR GRANTING THE WRIT PRAYED.

There is no conflict among the circuits; and the petition presents no important issue of Federal law which is not

clearly foreclosed by the statutory language or clearly decided in long-standing precedents of this Court. The opinion below is dispositive of this action and of "at least four other cases now pending in the District Court", in petitioner's view (Pet. 10). The "doubt" raised by petitioner concerning the full scope of the opinion below (Pet. 15), obviously relate to issues which are not presented by the instant case and would not be resolved by granting the petition herein.

Denial of the petition, moreover, would terminate this insubstantial litigation and enable the Treasury to resume the prompt and orderly distribution of the Fund which Congress specifically directed. *Supra,* pp. 5-7. Petitioner's single action has tied up most of the remaining balance in the Fund and is delaying full *pro rata* distribution thereof, with continuing and irreparable losses to the holders of 646 awards. *Supra,* pp. 3-4.

The Commission's consideration of claims against other countries, referred to by petitioner (Pet. 11), simply reinforces the public interest in finality of settlement and orderly distribution. In establishing the Foreign Claims Settlement Commission under Reorganization Plan Number 1, 1954, the President stressed that the Commission

> "will be able to administer any additional claims programs financed by funds derived from foreign governments without the delay which has often characterized the initiation of past programs. Moreover, the use of an existing agency will be more economical than the establishment of a new commission to administer a given type of foreign claims program". H. Doc. 381, 83d Cong. 2d Sess., p. 2.

Pursuant to Executive recommendation, Congress recently authorized the Commission, among other claims matters, to adjudicate claims by United States nationals against Roumania, Hungary, Bulgaria, Italy, and the Soviet Union. 69 Stat. 562. The claims against the

Soviet Union date from World War I, and the claims against the other countries arose under the satellite peace treaties in 1947 or shortly thereafter. The new law also bars court review (§314); and in its enactment, Congress strongly reiterated the international law principle here applied by the Commission, requiring the claimant to be a national of the United States on the date of actual deprivation or damage. S. Rep. 1050, Committee on Foreign Relations, 84th Cong. 1st Sess. p. 9.

The new legislation thus confirms the policy of the United States to accord prompt recompense to eligible nationals of the United States. Petitioner's argument on the scope of review (Pet. 15), if adopted, would inevitably defeat national policy in regard to the above claims as well as Yugoslav claims, and flood the Federal courts with litigation on a multitude of complex issues concerning the eligibility of claimants and claims against these foreign Governments, issues which Congress intended the Commission to decide with finality.

CONCLUSION

The decision below follows the clear mandate of Congress and the applicable precedents of this Court. The petition presents no substantial basis for review by writ of certiorari, and accordingly should be denied.

Respectfully submitted,

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